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HOSPITALS

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Attorneys for Plaintiff  
GLORIA MARTINEZ

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

GLORIA MARTINEZ,

Plaintiff,

v.

KAISER FOUNDATION HOSPITALS; THE  
PERMANENTE MEDICAL GROUP, INC.;  
SERVICE EMPLOYEES INTERNATIONAL  
UNION; DOES 1 to 10,

Defendants.

CASE NO. 3:12-cv-01824-EMC

JOINT STIPULATION AND REQUEST TO  
CONTINUE INITIAL CASE  
MANAGEMENT CONFERENCE AND  
[PROPOSED] ORDER

Plaintiff GLORIA MARTINEZ and Defendants SEIU, UHW – WEST, THE  
PERMANENTE MEDICAL GROUP, INC., and KAISER FOUNDATION HOSPITALS

(collectively, the "Parties"), through their counsel of record, hereby stipulate and request that (1)

1 the Initial Case Management Conference ("Conference") be continued from July 31, 2012 to  
2 August 24, 2012, (2) the filing deadline for the Parties' Joint Conference Statement be continued  
3 from July 24, 2012 to August 17, 2012, and (3) the deadline for the Parties to meet and confer  
4 before the Initial Conference be continued from July 10, 2012 to August 3, 2012.

5 In connection with this requested continuance, the Parties also stipulate that the Parties will  
6 exchange Initial Disclosures on or before August 17, 2012.

7 Good cause for a continuance exists because, as a result of the Court's recent Order  
8 granting Defendant SEIU, UHW-West's motion to dismiss with leave for Plaintiff to amend her  
9 complaint, Defendants wish to refrain from engaging in discovery until Plaintiff timely amends  
10 her complaint or her time to do so expires. (*See* Dck. # 30) Plaintiff has consented to Defendants'  
11 request. Pursuant to the Court's Order, Plaintiff has until August 6, 2012 to timely amend her  
12 complaint. (*Id.*, 24:17)

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1 DATED: July 11, 2012

HANSON BRIDGETT LLP

3 By: /s/ Jenica D. Mariani

4 LISA M. POOLEY

JENICA D. MARIANI

Attorneys for Defendants

THE PERMANENTE MEDICAL GROUP, INC.  
and KAISER FOUNDATION HOSPITALS

8 DATED: July 11, 2012

WEINBERG, ROGER & ROSENFELD

A Professional Corporation

11 By: /s/ Yuri Y. Gottesman

BRUCE A. HARLAND

YURI Y. GOTTESMAN

Attorneys for Defendant

SEIU, UHW – West

14 DATED: July 11, 2012

LAW OFFICES OF JOHN F. MARTIN

A Professional Corporation

17 By: /s/ Christine Hopkins

JOHN F. MARTIN

CHRISTINE HOPKINS

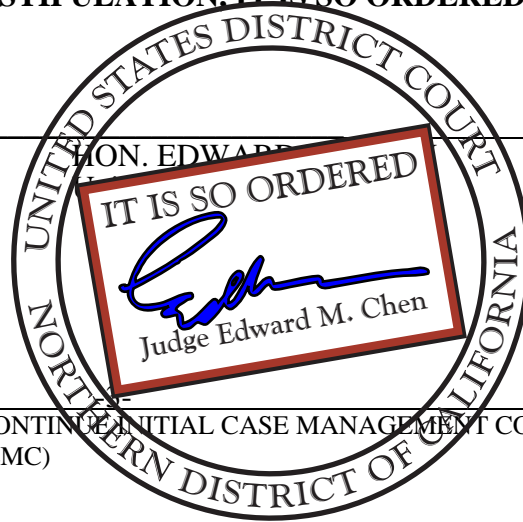
Attorneys for Plaintiff

GLORIA MARTINEZ

22 **PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.**

24 July 16, 2012

25 Dated: \_\_\_\_\_



28 JOINT STIPULATION AND REQUEST TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND  
[PROPOSED] ORDER (Case #3:12-cv-01824-EMC)